

VERIZON RESPONSE TO NJ BPU KPMG EXCEPTION

Exception #:	4
Component:	During Provisioning Verification of xDSL loops, KPMG observed that Verizon failed to meet a number of Local Service Confirmation (LSC) dates that Verizon provided to CLECs.
Domain:	POP
Date Uncovered by KPMG:	11/6/00
Date VERIZON Received:	11/6/00
Date VERIZON Responded:	11/29/00
KPMG Summary Statement and	Verizon's inability to meet their commitment to the CLEC for provisioning xDSL orders results in several detrimental effects including delay in the subscriber's new service and rescheduling installation appointments to the subscriber's premises. The end result is that the customer/supplier relationship between the new subscriber and the CLEC is damaged.

11/29/00 Response to Exception

VERIZON Response: Verizon has reviewed the four examples provided above and has determined the following:

KPMG Consulting's (KCI's) assessment discusses, in general, the issue of missed appointments for xDSL service. KCI discusses how missed commitments require the CLECs to notify their customer that service would be delayed. The specific examples provided predominately deal with lack of facilities. Verizon NJ respectfully points out that the primary cause of delay for service is "no access" at the customer's location, a condition that is not in the control of Verizon.

Concerning the four specific examples provided, the first two involve facility shortages. On occasion xDSL orders will not be completed on the due date due to facility issues. This occurs indiscriminately on retail and wholesales orders that require new dedicated copper facilities. New pairs are assigned to CLECs and Verizon NJ retail on a first come first served basis, as documented in Verizon methods and procedures, therefore, CLECs are not disadvantaged. A comparison of Verizon retail xDSL orders and CLEC xDSL orders in strict accordance with the current metric may not show a clear picture considering that the vast majority of Verizon NJ's orders use existing loops. This is significant because all UNE 2 wire xDSL CLEC orders have new facilities assigned, and are therefore more likely to encounter facility shortages.

We expect the instances of CLEC xDSL facility shortages to be reduced due to the implementation of the Line Sharing product. In these instances, new copper facilities are not required for this service if the existing customer is served via copper.

Concerning the third example provided, this example is for an ISDN loop not xDSL.

On the last example provided, this line was tested and turned up to the CLEC at 19:02 on 10/24, which was on time. Therefore, this was not a case of an untimely installation. There was a subsequent trouble ticket issued (several days later) that resulted in reconnection of the facilities in the Central Office due to an open connection in the MDF.